

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
ABINGDON**

UNITED STATES OF AMERICA

v.

JONATHAN AVERY SHUMATE

:
:
:
:
:

Case No. 1:22CR8

Violation: 18 U.S.C. § 2422(b)

INFORMATION

COUNT ONE

The United States Attorney charges that:

1. From November 15, 2021 through December 6, 2021, in the Western District of Virginia and elsewhere, JONATHAN AVERY SHUMATE used a facility and means of interstate or foreign commerce to knowingly persuade, induce, entice, and coerce any individual who had not attained the age of 18 years, to engage in any sexual activity for which any person can be charged with a criminal offense, and attempted to do so.

2. All in violation of Title 18, United States Code, Section 2422(b).

NOTICE OF FORFEITURE

1. Upon conviction of the felony offense alleged in this Information, the defendant shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of law, pursuant to 18 U.S.C. § 2253(a)(1);
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from said violation of law, pursuant to 18 U.S.C. § 2253(a)(2);
- c. any property, real or personal used or intended to be used to commit or to promote the commission of said violation of law, or any property traceable

to such property, pursuant to 18 U.S.C. § 2253(a)(3).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. **Electronic Equipment**

One Samsung Galaxy S9 Cellular Telephone
One Black and Red Omen Laptop (Serial No. 5CD817IWRz)
One Sony Memory Stick 4GB
One Black Scandisk 4GB Thumb Drive
Two Black HP 4GB Thumb Drives

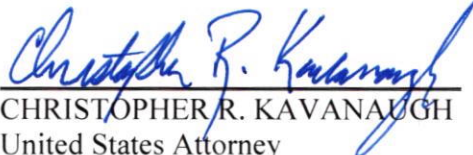
b. All such material containing the above-described visual depictions.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

ENTERED, this 16th day of February, 2022.


CHRISTOPHER R. KAVANAUGH
United States Attorney

by
LLB